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Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street NW  
Washington DC 20554

In the matter of RM-11346, "Changes in Part 97 with regard to Amateur Radio Service Rules, 97.119(a) Station Identification":

Current Amateur Radio Service Rules require periodic station identification during a two-way contact, and at the end of such a contact. 47 CFR 97.119(a). Petitioner's proposal would alter the current requirement of identification every ten minutes during a prolonged contact to identification every thirty minutes during a prolonged contact, as well as the requisite identification at the close of such a contact.

I feel that such a change would be detrimental to the Amateur Radio service for the following reasons:

1. It is contrary to good operating practice, especially in the lower HF frequency bands, where maintenance of two-way contact is rarely possible for such extended periods as Petitioner envisions.
2. It reduces the ability of qualified Official Observers to monitor and/or identify operators or stations which may be operating outside the privileges granted by their license, either by accident or intent.
3. It reduces the ability of other operators to identify stations with whom they may wish to attempt contact.

Respectfully submitted,

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